

Exhibit 1

RESPONSES TO SPECIFIC INTERROGATORIES

Defendants incorporate the forgoing objections to instructions and definitions and specifically respond to the Interrogatories as described below.

Interrogatory No. 1:

Identify documents that are commonly obtained, reviewed, or created during USCIS's consideration of an affirmative asylum application, including which documents are included on the "Record" side of the file maintained by USCIS for an affirmative asylum applicant, which documents are on the "Non-Record" side, and which documents (if any) are not included in either the "record" or "Non-Record" side of the file. Include the following documents, to the extent that they may be commonly obtained, reviewed, or created as part of USCIS's consideration of an affirmative asylum application: the asylum application, a marked-up asylum application, the interview notice, a Request for Evidence or Notice of Intent to Deny, a response to a Request for Evidence or Notice of Intent to Deny, the record of changes document, notes from a credible or reasonable fear interview, assessments, visa applications, notes from a visa interview, security checks, and documents relating to other applications previously filed before USCIS. If any these items are not commonly obtained, reviewed, or created as part of USCIS's consideration of an affirmative asylum application, state so.

Response:

In conjunction with each affirmative asylum application, USCIS: (1) grants asylum, (2) denies asylum, (3) refers the application to immigration court for adjudication in removal proceedings, or (4) closes the application without adjudicating it. USCIS evaluates each asylum application individually and, depending on the application and the issues raised by that application or applicant, USCIS may obtain, review, or create documents (whether in electronic or hardcopy form) different from those obtained, reviewed, or created in conjunction with its consideration of another asylum application. Because this interrogatory requests only those documents that are commonly obtained, commonly reviewed, or commonly created, USCIS understands this question to be asking what it presently obtains, reviews, or creates in conjunction with a significant number of the affirmative asylum applications it considers across each of the potential outcomes described in the first sentence above. Thus, the documents (whether in electronic or hardcopy form) in the left column of the chart below are presently obtained, reviewed, or created by USCIS in

conjunction with its consideration of a significant number of affirmative asylum applications that result in grants, that result in denials, that result in a referral to immigration court, or that result in a closure without adjudicating the application. The list of documents in the chart below is not an exhaustive or a minimal list of each and every document that USCIS may obtain, review, or create in conjunction with its consideration of an affirmative asylum application.

This interrogatory also asks whether the documents in the left column of the chart below are stored on the “Record” side of the file, stored on the “Non-Record” side of the file, or not included in either the “Record” or “Non-Record” side of the file. Defendants understand “file” here to mean the affirmative asylum applicant’s physical Alien file (“A-file”). An A-file includes an individual’s official immigration and naturalization records. Defendants understand the reference to the “Record” side to mean the left side of a physical (hard copy) A-file and understand “Non-Record” side to mean the right side of a physical (hard copy) A-file. The right column of the chart below identifies whether the identified document, if in hard-copy form, is typically filed on the “Record” or left side of the physical A-file, “Non-Record” or right side of the physical A-file, or neither.

Document	Record side of the physical A-file, Non-Record side of the physical A-file, or Neither
Asylum application	Record
Marked-up asylum application	Record (not a separate document from the asylum application, but rather an annotated version of the asylum application)
Interview Notice	Record
Request for Evidence	Record
Notice of Intent to Deny	Record
Response to a Request for Evidence	Record
Response to Notice of Intent to Deny	Record
Record of changes document	Neither (digital document only; not present in the hard-copy physical A-file)
Assessments	Record
Background and security checks	Non-Record

G-28	Record
Notice to Appear	Record
Copy of I-94	Record
Decision Letter	Record
Pick-up/mail-out notice	Record
Record of applicant and interpreter oaths	Record
Waiver of presence of representative	Record
Acknowledgement of receipt	Record
Change of address notification	Record
Sworn statement taken by asylum officer	Record
Supporting documentation provided by asylum applicant	Record
Country conditions submitted by applicant	Record
Memos to file	Non-Record
I-213	Non-Record
Notes from asylum interview	Non-Record
Internal correspondence	Non-Record
Miscellaneous I-797	Non-Record
Certified Mail Receipts	Record
Case inquiry forms	Record
Local case processing worksheets	Non-Record
No show warning notice	Record
Biometric Appointment Notice	Record

The following documents specifically identified in the second sentence of Interrogatory No. 1 are not commonly obtained, commonly reviewed, or commonly created by USCIS in conjunction with its consideration of an affirmative asylum application: (1) notes from a credible or reasonable fear interview, (2) visa applications, (3) notes from a visa interview, and (4) documents relating to other applications previously filed before USCIS. This is so with respect to notes from a credible or reasonable fear interview because affirmative asylum applicants would not commonly have been placed into the expedited removal process or been subject to a prior order of removal, which are prerequisites to receiving a credible fear or reasonable fear screening, respectively. Similarly, affirmative asylum applicants do not commonly apply for a visa before

entering the United States. And finally, affirmative asylum applicants commonly have not applied for other immigration benefits with USCIS, as the asylum application generally must be filed within one year of the applicant's arrival in the United States.

The Affirmative Asylum Procedures Manual ("AAPM") contains a chart on pages USCIS000004238 - USCIS000004239 that lists documents which may be created or obtained in conjunction with USCIS's consideration of an affirmative asylum application. That chart identifies the EOIR coversheet, Bureau of Democracy, Labor and [Human] Rights ("DRL") response from the Department of State, the FD-258 fingerprint card, Form G-325A, and the asylum application intake checklist. These are historical documents and are no longer commonly obtained, reviewed, or created by USCIS as part of the adjudication of an affirmative asylum application.